

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARCUS HILLIARD,	)	
	)	
PLAINTIFF,	)	
	)	Case No. 20-cv-1144
v.	)	
	)	Judge Martha M. Pacold
NATIONAL BOARD OF MEDICAL	)	
EXAMINERS and LOYOLA	)	Magistrate Judge Gabriel A. Fuentes
UNIVERSITY OF CHICAGO,	)	
	)	
DEFENDANTS.	)	

**UNOPPOSED MOTION FOR ADDITIONAL TIME TO COMPLETE  
SCHEDULED DEPOSITIONS**

Plaintiff Marcus Hilliard (“Plaintiff”) by his undersigned counsel, respectfully request an additional 10 days for disclosure of Rule 26(a)(2) expert disclosures and to extend expert discovery to July 1, 2023. In support of this motion, the parties state as follows:

1. Since the start of discovery in July 2023, the parties have been committed to moving this case forward and originally aimed to complete discovery within three months. *See* Dkt. Nos. 63, 64 (setting October 14, 2022 as the deadline to complete fact discovery). As a result of the significant volume of documents, the need for third-party discovery, and confidentiality issues related to the production of student and medical files, however, discovery took longer than anticipated to complete and the parties moved to extend the fact discovery deadline – first to December 15, 2022, then to January 30, 2023, and then to February 8, 2023 as the parties awaited additional third-party document productions. *See* Dkt. Nos. 72, 73, 78, 79, 81.

2. The parties completed fact discovery on February 8, respectively.

3. Pursuant to prior Order Plaintiff’s Rule 26(a)(2) expert disclosure is due to be served by plaintiff on April 3, 2023. *See* Dkt. No. 79.

4. Plaintiff's expert needs additional time to complete his report and Plaintiff requests and Defendant does not object to Plaintiff receiving an additional ten days to on or before April 13, 2023 for his expert disclosure. Defendant would then have until May 22, 2023 for its expert disclosure and the expert discovery closure date would be Monday, July 3, 2023.

5. Plaintiff brings this motion in good faith and not to unduly delay the proceeding.

WHEREFORE, the parties jointly and respectfully request that the Court grant this request and order Plaintiff's Rule 26(a)(2) expert disclosure is due to be served by plaintiff no later than April 13, 2023, and defendant no later than May 22, 2023, with expert discovery to be closed on July 3, 2023.

Dated: March 29, 2023

Respectfully Submitted,

**MARCUS HILLIARD**

/s/ Cynthia M. Rote

Cynthia M. Rote

Integrate Legal, PC

516 Main Street, Suite 1

Pecatonica, IL 61063

Cynthia@Integrate-Legal.com

(815) 255-4695